



# American Telecommunications Systems, Inc.

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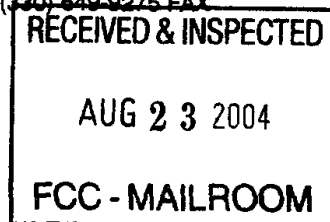


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August 19, 2004

**VIA OVERNIGHT DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554  
Attention: Chief, Pricing Policy Division, Wireline Competition Bureau



Re: CC Docket No. 94-129  
Drop-Off Exemption Certification for American Telecommunications Systems, Inc.

Dear Ms. Dortch:

In its Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking, released March 17, 2003 ("Order"), the Federal Communication Commission partially overturned its requirement that a carrier's sales agent must drop-off a sales call once the sales agent has initiated independent third-party verification using a three-way conference call. Under prior FCC rules, for sales that are verified through a three-way conference call or a call through an automated verification system, a carrier's sales agent must drop off the call once the three-way connection has been established. In the Order, the FCC created an exemption to the "drop-off" rule for any carrier that certifies to the FCC that their sales agents are unable to drop off the sales call after initiating a third party verification.

Please accept this letter as the company's certification that its sales agents are unable to drop off the sales call after initiating a third party verification. The sales agents are unable to drop off the sales call because compliance is not feasible since the company lacks the technical means to comply with the requirement.

I, Bill Stathakaros, pursuant to 28 U.S.C. § 1746, declare that the foregoing is true and correct, under penalty of perjury.

Signed this 19<sup>th</sup> day of August 2004.

Mr. Bill Stathakaros, President  
AMERICAN TELECOMMUNICATIONS SYSTEMS, INC.

\_\_\_\_\_  
Signature of Officer

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